

1 GIBSON, DUNN & CRUTCHER LLP  
2 LAUREN R. GOLDMAN (*pro hac vice pending*)  
lgoldman@gibsondunn.com  
3 DARCY C. HARRIS (*pro hac vice pending*)  
dharris@gibsondunn.com  
200 Park Avenue  
4 New York, NY 10166  
Telephone: (212) 351-4000  
5 Facsimile: (212) 351-4035  
6 ELIZABETH K. MCCLOSKEY, SBN 268184  
emccloskey@gibsondunn.com  
7 ABIGAIL A. BARRERA, SBN 301746  
abarrera@gibsondunn.com  
8 555 Mission Street, Suite 3000  
San Francisco, CA 94105  
9 Telephone: (415) 393-4622  
Facsimile: (415) 801-7389  
10 ANDREW M. KASABIAN, SBN 313210  
11 333 South Grand Avenue  
Los Angeles, CA 90071 USA  
12 Telephone: (213) 229-7311  
Facsimile: (213) 229-6311  
13 akasabian@gibsondunn.com

14 *Attorneys for Defendant Meta Platforms, Inc.*  
*(formerly known as Facebook, Inc.)*  
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17 UNITED STATES DISTRICT COURT  
18  
19 NORTHERN DISTRICT OF CALIFORNIA  
20  
21 SAN FRANCISCO DIVISION

22 JANE DOE, individually and on behalf of all  
other similarly situated,

23 Plaintiff,

24 v.  
25

GOODRX HOLDINGS, INC., CRITEO  
CORP., META PLATFORMS, INC., AND  
GOOGLE LLC.,

26 Defendants.  
27

28 Case No. 3:23-cv-00501-LB

**STIPULATION TO EXTEND TIME TO  
RESPOND TO PLAINTIFF'S COMPLAINT**

Action Filed: February 2, 2023

Honorable Laurel Beeler

1 Pursuant to Civil Local Rule 6-1(a), Plaintiff Jane Doe (“Plaintiff”) and Defendants Meta  
2 Platforms, Inc. (“Meta”), Criteo Corp. (“Criteo”), and Google LLC (“Google”), by and through their  
3 respective counsel of record, hereby stipulate as follows:

4 WHEREAS, Plaintiff filed this action on February 2, 2023;

5 WHEREAS, Meta was served with the Complaint on February 6, 2023;

6 WHEREAS, Criteo was served with the Complaint on February 6, 2023;

7 WHEREAS, Google was served with the Complaint on February 6, 2023;

8 WHEREAS, Meta, Criteo, and Google’s deadlines to respond to the Complaint are all currently  
9 set for February 27, 2023;

10 WHEREAS, counsel for Meta, Criteo, and Google and counsel for Plaintiff have conferred  
11 regarding this stipulation;

12 WHEREAS, the parties have agreed to extend Meta, Criteo, and Google’s deadlines to respond  
13 to the Complaint by 45 days to April 13, 2023;

14 WHEREAS, the parties further agree that if Meta, Criteo, and/or Google file motions to dismiss  
15 the Complaint, Plaintiff shall have until May 30, 2023 to file her papers in opposition to the motions  
16 to dismiss the Complaint;

17 WHEREAS, the parties further agree that Meta, Criteo, and Google shall have until June 23,  
18 2023 to file their replies to Plaintiff’s opposition;

19 WHEREAS, the proposed stipulated extensions will not alter the date of any event or deadline  
20 already fixed by Court order;

21 WHEREAS, this stipulation is without prejudice to any defense Meta, Criteo, or Google  
22 might assert in this action;

23 NOW, THEREFORE, the parties hereby stipulate and agree that Defendants Meta, Criteo,  
24 and Google’s deadlines to respond to the Complaint shall be extended by 45 days to April 13, 2023,  
25 Plaintiff’s deadline to oppose any motions to dismiss filed by Defendants Meta, Criteo, and Google  
26 shall be extended by 46 days to May 30, 2023, and Defendants Meta, Criteo, and Google’s deadlines  
27 to reply to Plaintiff’s opposition shall be extended to June 23, 2023.

28 IT IS SO STIPULATED.

1  
2 Dated: February 27, 2023

**GIBSON, DUNN & CRUTCHER LLP**

3 By: /s/ Darcy C. Harris  
4 Darcy C. Harris

5 LAUREN R. GOLDMAN (*pro hac vice pending*)  
6 DARCY C. HARRIS (*pro hac vice pending*)  
7 lgoldman@gibsondunn.com  
8 dharris@gibsondunn.com  
9 200 Park Avenue  
10 New York, NY 10166  
11 Telephone: (212) 351-4000  
12 Facsimile: (212) 351-4035

13 ELIZABETH K. MCCLOSKEY, SBN 268184  
14 emccloskey@gibsondunn.com  
15 ABIGAIL A. BARRERA, SBN 301746  
16 abarrera@gibsondunn.com  
17 555 Mission Street, Suite 3000  
18 San Francisco, CA 94105  
19 Telephone: (415) 393-4622  
20 Facsimile: (415) 801-7389

21 ANDREW M. KASABIAN, SBN 313210  
22 333 South Grand Avenue  
23 Los Angeles, CA 90071 USA  
24 Telephone: (213) 229-7311  
Facsimile: (213) 229-6311  
akasabian@gibsondunn.com

**COOLEY LLP**

18 By: /s/ Michael G. Rhodes  
Michael G. Rhodes

19 MICHAEL G. RHODES, SBN 116127  
20 rhodesmg@cooley.com  
21 KYLE C. WONG, SBN 224021  
kwong@cooley.com  
22 CAROLINE A. LEBEL, SBN 340067  
clebel@cooley.com  
23 3 Embarcadero Center, 20th Floor  
24 San Francisco, CA 94111-4004  
Telephone: (415) 693-2000  
Facsimile: (415) 693-2222

25 *Attorneys for Defendant Meta Platforms, Inc.*  
26 *(formerly known as Facebook, Inc.)*

# **SHEPPARD, MULLIN, RICHTER & HAMPTON LLP**

By: /s/ Thomas Dillickrath  
Thomas Dillickrath

THOMAS DILLICKRATH (*pro hac vice*  
forthcoming)  
2099 Pennsylvania Avenue, N.W., Suite 100  
Washington, DC 20006-6801  
Telephone: (202) 747-1900  
Facsimile: (202) 747.1901  
[tdillickrath@sheppardmullin.com](mailto:tdillickrath@sheppardmullin.com)

TENAYA RODEWALD, SBN 248563  
1540 El Camino Real, Suite 120  
Menlo Park, CA 90425  
Telephone: (650) 815.2600  
Facsimile: (650) 815.2601  
[trodewald@sheppardmullin.com](mailto:trodewald@sheppardmullin.com)

SARAH BLITZ, SBN 280118  
333 South Hope Street  
Forty-Third Floor  
Los Angeles, CA 90071  
Telephone: (213) 620-1780  
Facsimile: (213) 620-1398  
[sblitz@sheppardmullin.com](mailto:sblitz@sheppardmullin.com)

*Attorneys for Defendant Criteo Corp.*

**WILLKIE FARR & GALLAGHER LLP**

By: /s/ Benedict Y. Hur  
Benedict Y. Hur

BENEDICT Y. HUR (SBN 224018)  
BHur@willkie.com  
SIMONA AGNOLUCCI (SBN 246943)  
SAgnolucci@willkie.com  
EDUARDO E. SANTACANA (SBN 281668)  
ESantacana@willkie.com  
TIFFANY LIN (SBN 321472)  
TLin@willkie.com  
YUHAN CHI (SBN 324072)  
YChi@willkie.com  
One Front Street, 34th Floor  
San Francisco, CA 94111  
Telephone: 415.858.7400  
Facsimile: 415.858.7599

*Attorneys for Defendant Google LLC*

1 By: /s/ Amanda Fiorilla  
2

3 **LOWEY DANNENBERG, P.C.**  
4 CHRISTIAN LEVIS (admitted *pro hac vice*)  
5 AMANDA FIORILLA (admitted *pro hac vice*)  
6 RACHEL KESTEN (admitted *pro hac vice*)  
7 44 South Broadway, Suite 1100  
White Plains, NY 10601  
Tel.: (914) 997-0500  
clevis@lowey.com  
afiorilla@lowey.com  
rkestens@lowey.com

8 **SCHUBERT JONCKHEER & KOLBE LLP**  
9 ROBERT C. SCHUBERT (SBN 62684)  
WILLEM F. JONCKHEER (SBN 178748)  
AMBER L. SCHUBERT (SBN 278696)  
10 2001 Union Street, Suite 200  
San Francisco, CA 94123  
Tel: (415) 788-4220  
Fax: (415) 788-0161  
rschubert@sjk.law  
wjonckheer@sjk.law

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12  
13 *Attorneys for Plaintiff*  
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**CIVIL L.R. 5-1(h)(3) ATTESTATION**

Pursuant to Civil Local Rule 5-1(h)(3), I, Darcy C. Harris, hereby attest under penalty of perjury that concurrence in the filing of this document has been obtained from all signatories.

Dated: February 27, 2023

## GIBSON, DUNN & CRUTCHER LLP

By: /s/ Darcy C. Harris  
Darcy C. Harris